

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE STAR SCIENTIFIC, INC.
SECURITIES LITIGATION

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Master File No.: 3:13-CV-0183-JAG

CLASS ACTION

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
CONSOLIDATED AMENDED COMPLAINT**

COMES NOW Defendant Jonnie R. Williams, Sr., by counsel, and respectfully requests an extension of time of seven (7) days to respond to the Consolidated Amended Complaint.

Counsel for Plaintiffs does not object to the relief requested herein. In support of his motion,

Defendant states as follows:

1. On September 5, 2013, Plaintiffs filed a Consolidated Amended Complaint in this Court. The Consolidated Amended Complaint alleges Defendants Star Scientific, Inc., Rock Creek Pharmaceuticals, Inc., Paul L. Perito, Jonnie R. Williams, Sr., Park A. Dodd, III, and Curtis Wright (collectively “Defendants”) made false and materially misleading statements and omissions in violation of federal securities laws.

2. Pursuant to an Initial Pretrial Order [Doc. No. 61], which governs the pretrial schedule for this case, Defendants’ response to the Consolidated Amended Complaint was due on January 17, 2014. The Initial Pretrial Order states that in extraordinary cases, the Court will modify this requirement on motion of a party. (Pretrial Order ¶ 4.)

3. On January 16, 2014, upon consideration of Defendants' Consent Motion for an Extension of Time to File an Answer [Doc. No. 63], the Court ordered Defendants to file an answer on or before January 24, 2014 [Doc. No. 64].

4. On January 23, 2014, counsel for Defendant Star Scientific and Defendant Williams agreed that Defendant Williams should retain separate counsel to file a separate answer to the Consolidated Amended Complaint. Defendant Williams retained counsel on that same day.

5. Also on January 23, 2014, Nicholas Terris, counsel for Defendant Star Scientific, conferred with Stephen Oddo, counsel for Plaintiffs, and advised that Defendant Williams had retained counsel and would file a separate answer to the Consolidated Amended Complaint. Counsel for Plaintiffs did not object to the relief requested in this Motion.

6. Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and for good cause to accommodate this change of counsel and to provide the time necessary for Defendant Williams to respond to the Consolidated Amended Complaint, Defendant Williams respectfully requests that this Court extend the deadline to respond to the Consolidated Amended Complaint by seven (7) days to January 31, 2014.

WHEREFORE, Defendant Williams respectfully requests that the Court enter the proposed Order, attached hereto, granting this motion and extending the deadline by which Defendant Williams must answer the Consolidated Amended Complaint to January 31, 2014, or granting Defendant Williams such other and further relief as the Court deems appropriate.

Dated: January 24, 2014

Respectfully Submitted,

JONNIE R. WILLIAMS, SR.

/s/

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*Counsel for Defendant Jonnie R. Williams,
Sr.*

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing (NEF) to the following:

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